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November 4, 2022

Hon. Kimba M. Wood
United States District Judge
United States Courthouse
500 Pearl Street
New York, NY 10007

Filed by ECF

MEMO ENDORSED

Re: Motion for Early Termination of Supervised Release.
#19cr 484(KMW)

Dear Judge Wood;

Please accept this letter motion on behalf of defendant Oris Sanchez-Olivo for early termination of her Supervised Release term of 36 months.

KMW
Granted

1. Sanchez-Olivo surrendered to begin serving her prison term at FCI Danbury on March 3, 2021. Her subsequent application for Compassionate Release was denied by the Warden of FCI Danbury, and your Honor.

2. Oris Sanchez Olivo is 32 years old [DOB 10-22-1990]. Sanchez Olivo was convicted in the United States District Court for the Southern District of New York (Hon. Kimba M Wood) on or about March 4, 2020, of violating 18 USC @1344 [Bank Fraud], and was sentenced to 3 months incarceration, 3 years supervised release with the condition that 3 months of said term shall be served under home confinement, ordered to pay \$60,039.44 restitution, and a \$100 special assessment. On or about August 16, 2019, Oris entered her guilty plea to Count Two of the Indictment, which charged her with bank fraud, in violation of 18 U.S.C. § 1344.

Sanchez-Olivo surrendered to begin serving her term of incarceration on March 3, 2021.

3. Ms. Sanchez Olivo has suffered from Asthma since early childhood, and is medicated with a ventilator. She also suffers from acute Gastritis.

4. Sanchez Oliivo is citizen of the USA; is married to Danibel Luis Fecha and the mother

of two children ages 10 [Dorsibel] and 6 [Danibel]. They live together in the Bronx as a family. Danibel is a commercial painter.

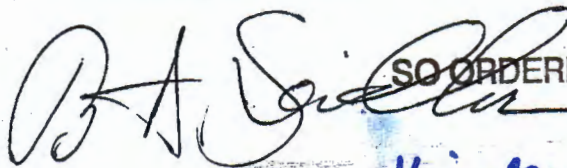
5. Prior to her incarceration Oris was employed at Self Help Community Services since 2009, and as a home health aide at Accent Care since 2015, and at Lenox Medical Services since 2019. Since her release from incarceration on June 1, 2021. Oris has been working at "San Barnabas Hospital" full-time for 1 year in different departments such as Gynecology, Pediatrics, Oncology, Vascular, and Neurology. She regularly pays her restitution sum monthly at the rate of \$312.00.

6. Oris has now completed 18 months of her Supervised Release Term. She is now a member of the SDNY Probation Department's Low Intensity Program. Her Probation Officer, Mr. Pierre Reyes informs me he does not object to early termination of Supervised Release for Oris. Probation Officer Reyes informed me today that Oris has had no negative incidents while under supervision, no positive drug tests, and has made all her Restitution payments on schedule.

7. The Court may terminate an individual's supervised release "at any time after the expiration of one year... if [the court] is satisfied that such action is warranted by the conduct of the defendant released and the interest of justice." 18 U.S.C. § 3583(e)(1). To make this determination, courts are directed to consider "the factors set forth in section 3553(a)(1), (a)(2)(B), (a)(2)(C), (a)(2)(D), (a)(4), (a)(5), (a)(6) and (a)(7)," essentially the same factors a court considers at sentencing. It is the belief of Oris Sanchez she has successfully returned to a responsible role in society, reintegrated with her family and community, and that the needs of Supervision have been satisfied. She seeks the ability to travel freely, and in doing so care for family members in medical need [letter attached].

WHEREFORE, defendant Sanchez-Olivo seeks the early termination of Supervised Release, and such other relief as is appropriate.

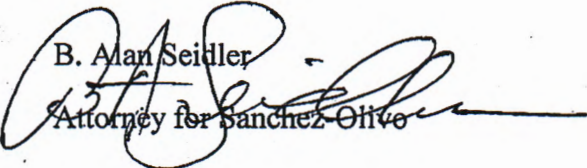
Respectfully submitted,



SO ORDERED: N.Y., N.Y. 11/16/22

Kimba M. Wood

KIMBA M. WOOD
U.S.D.J.


B. Alan Seidler
Attorney for Sanchez-Olivo